



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK:BW/MG/RB
F. #2021R00629

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 5, 2023

By ECF

The Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Jin Hua Zhang, et al.
Criminal Docket No. 22-458 (LDH)

Dear Judge DeArcy Hall:

The government respectfully requests, with the consent of defense counsel, that the Court so-order a ministerial edit to the indictment in the above-captioned case. Specifically, the government requests that defendant Chen Chen's name be corrected to read "Cencheng Luo" and defendant Xin Jin's name be corrected to read "Xin Jin Chen."

Because this is a matter of form, and not substance, the Court is permitted to make such an amendment. "Innumerable cases have allowed amendment by the Court or the prosecutor without Grand Jury action" where the edit is "a ministerial change." United States v. McGrath, 558 F.2d 1102, 1105 (2d Cir. 1977).

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Raffaella Belizaire
Raffaella Belizaire
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cc: Clerk of Court (by ECF)
Donald Dennis DuBoulay, Counsel to Defendant Chen Chen
Arthur Kenneth Womble, Jr., Counsel to Defendant Xin Jin